

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 5/12/08

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MUSALLI FACTORY FOR GOLD
& JEWELLRY CO.,

Plaintiff,

-against-

JPMORGAN CHASE BANK N.A., CHASE
INVESTMENT SERVICES CORPORATION,
and NICHOLAS GAMBELLA,

Defendants.
-----X

1:08-cv-01720 (LAP)

**STIPULATION REGARDING
EXTENSION OF TIME**

WHEREAS, the complaint in this matter was initially filed in the United States District Court for the Eastern District of New York on or about October 30, 2007;

WHEREAS, this matter was transferred upon stipulation to the United States District Court for the Southern District of New York on or about March 10, 2008;

WHEREAS, pursuant to an April 16, 2008 Order of the Court, on April 29, 2008 defendants provided plaintiff a letter outlining the alleged deficiencies in plaintiff's complaint that will constitute the bases for defendants' motion to dismiss pursuant to Federal Rule of Civil Procedure 12(b)(6);

WHEREAS, pursuant to the Court's order, plaintiff must advise the Court and defendants' counsel by May 9, 2008 whether it will amend the complaint and, if so, must file the amended complaint by May 16, 2008;

WHEREAS, plaintiff will amend the complaint and desires a two-week extension of the time previously ordered by the Court to do so;

WHEREAS, in the event that the defendants decide to move to dismiss the amended complaint, the parties will confer and submit a proposed briefing schedule; and

WHEREAS, the Court previously granted defendants' request for an adjournment of time to respond to plaintiffs' complaint, and plaintiff has not requested a previous adjournment of time.

THEREFORE, it is hereby Stipulated and Agreed that:


1. The time for plaintiff to file its amended complaint shall be adjourned until May 30, 2008;

2. If defendants decide to move to dismiss the amended complaint, the parties will confer and submit a proposed briefing schedule to the Court.

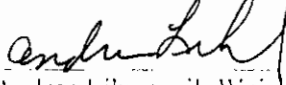

Dated: New York, New York
May 8, 2008

THE LAURO LAW FIRM

LEVI LUBARSKY & FEIGENBAUM LLP

By:  _____
John F. Lauro, Esq.
101 East Kennedy Blvd.
Bank of America Plaza – Suite 3100
Tampa, FL 33602
T: 813-222-8990
F: 813-222-8991

1540 Broadway, Suite 1604
New York, NY 10036
T: 646-746-8659
F: 212-938-0858
Attorneys for Plaintiff

  _____
Andrea Likwornik Weiss
Alan H. Scheiner
1185 Avenue of the Americas
17th Floor
New York, NY 10036
T: 212.308.6100
F: 212.308.8830
Attorneys for Defendants

So ordered this ____ day of _____, 2008.

Hon. Loretta A. Preska
United States District Judge

